

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LG. PHILIPS LCD CO., LTD.,

Plaintiff,

v.

TATUNG COMPANY;  
TATUNG COMPANY OF AMERICA, INC.;  
CHUNGHWA PICTURE TUBES, LTD.;  
AND VIEWSONIC CORPORATION,

Defendants.

Civil Action No. 05-292 (JJF)

DEMAND FOR JURY TRIAL

REDACTED - PUBLIC VERSION

DECLARATION OF SUZANNE B. DRENNON IN SUPPORT  
OF DEFENDANTS' REPLY IN SUPPORT OF ITS MOTION FOR  
PARTIAL SUMMARY JUDGMENT ON DAMAGES UNDER 35 U.S.C. § 287

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Dated: July 13, 2006

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Attorney for Defendants/Counterclaimants  
Tatung Company, Tatung Company of  
America, Chunghwa Picture Tubes, Ltd. and  
ViewSonic Corporation

DECLARATION OF SUZANNE B. DRENNON

I, Suzanne B. Drennon, declare:

1. I am an attorney licensed to practice in the State of California and am an associate with the law firm of Howrey LLP, attorney of record for Defendants Tatung Company; Tatung Company Of America, Inc., Chunghwa Picture Tubes, Ltd. and ViewSonic Corporation.
2. I have first hand knowledge of the facts set forth herein and, if called and sworn as a witness, I could and would testify competently and from personal knowledge as to these facts. I submit this declaration in support of Defendants' Reply In Support Of Its Motion For Partial Summary Judgment On Damages Under 35 U.S.C. § 287.
3. Attached hereto as Exhibit 1 is a true and correct copy of a February 8, 2002 letter from Jeong Hwan Lee to Cheng-Yuan Lin.
4. Attached hereto as Exhibit 2 is a true and correct copy of a February 27, 2002 letter from Jeong Hwan Lee to Cheng-Yuan Lin.
5. Attached hereto as Exhibit 3 is a true and correct copy of Claim Charts to United States Patent No. 6,373,537.
6. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the transcript of the July 3, 2006 Deposition of Ho Lee.
7. Attached hereto as Exhibit 5 is a true and correct copy of a July 22, 2002 letter from Hsiang-Kuel Chung to Jeong Hwan Lee.
8. Attached hereto as Exhibit 6 is a true and correct copy of a July 30, 2002 letter from Won-Jun Choi to Hsiang-Kuel Chung.
9. Attached hereto as Exhibit 7 is a true and correct copy of a *LG.Philips LCD Co., Ltd. v. Tatung Co. of America, Tatung Company and Chunghwa Picture Tubes, Ltd.*, No. E02-6775 CBM, Complaint for Patent Infringement, filed August 29, 2002..
10. Attached hereto as Exhibit 8 is a true and correct copy of a draft LG.Philips LCD Co., Ltd. Patent License Agreement.

11. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the transcript of the June 9, 2006 Deposition of Youngwoo Cho.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration is executed on July 13, 2006, at Wilmington, Delaware.



Suzanne B. Drennon

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**


**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 13, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing, and hand delivered to the following:

Richard D. Kirk  
The Bayard Firm  
222 Delaware Avenue, Suite 900  
P.O. Box 25130  
Wilmington, DE 19899

I hereby certify that on July 13, 2006, I sent the foregoing document by Electronic Mail, to the following non-registered participants:

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**UNITED STATES DISTRICT COURT  
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**CERTIFICATE OF SERVICE**

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